UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Yongping Wang : Chapter 13

:

Debtor : Bankruptcy No.19-16681-jkf

:

Objection to Proof of Claim four (#4)

of LVNV Funding LLC

Request for Admissions Pursuant to Rule 36 of the Federal Rules of Civil Procedure

Pursuant to Rule 7036 of the Federal Bankruptcy Rules and Rule 36 of the Federal Rules of Civil Procedure, Yongping Wang requests that the Claimant, LVNV Funding LLC answer each of the following Requests for Admissions, separately and under oath, within thirty (30) days from the date of service hereof. If the space provided after each is not sufficient for your answer, please use additional sheets. A true and correct copy of each document referenced is attached to these Requests for Admissions.

- 1. It is admitted that you, LVNV Funding LLC, are a Creditor in the Chapter 13 Bankruptcy Case of Yongping Wang, case number 19-16681-elf.
- 2. It is admitted that you, LVNV Funding LLC, filed Claim Four (#4), and hereto attached is a true and correct copy of the claim you filed with the Court.
- 3. It is admitted that the proof of claim asserts Yongping Wang is the sole Debtor to the proof of claim.
- 4. It is admitted that the Debtor did not use or make payment on this debt within four (4) years from the filing date of 10/25/2019, of this instant Chapter 13 Bankruptcy.
- 5. It is admitted that you do not have a right to assert this claim and such claim exceeds the Pennsylvania Statue of Limitations.
- 6. It is admitted that the claim in which you filed originated with Sherman Originator, LLC account number ending 6206.
- 7. It is admitted that this claim should be disallowed from the claims register.

/s/ Brandon Perloff, Esq. Brandon Perloff 415 S. Broad Street, 2R Philadelphia, PA 19147 bperloff@perlofflaw.com